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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

UELIAN DE ABADIA-PEIXOTO, *et al.*, ) Case No.: 3:11-cv-4001 RS

Plaintiffs,

V.

UNITED STATES DEPARTMENT OF  
HOMELAND SECURITY, *et al.*,

Defendants.

## CLASS ACTION

**DECLARATION OF ROBIN GOLDFADEN  
IN SUPPORT OF PLAINTIFFS’  
UNOPPOSED MOTION FOR FINAL  
APPROVAL OF CLASS ACTION  
SETTLEMENT**

Date: April 10, 2014  
Time: 1:30 p.m.  
Judge: Honorable Richard Seeborg  
Ctrm: 3, 17th Floor

1 I, Robin Goldfaden, declare:

2 1. I am a Senior Staff Attorney with the Lawyers' Committee for Civil Rights of the  
3 San Francisco Bay Area ("Lawyers' Committee"), co-counsel for Plaintiffs Uelian De Abadia-  
4 Peixoto, Esmar Cifuentes, Pedro Nolasco, and Mi Lian Wei in the above-captioned action. I  
5 submit this Declaration in support of Plaintiffs' Unopposed Motion in Support of Final Approval  
6 of Class Action Settlement. The following facts are based on my personal knowledge and, if  
7 called to testify to these facts, I could and would testify competently thereto.

8 2. Pursuant to the Court's January 23, 2014 Preliminary Approval Order, on  
9 January 30, 2014, I arranged for notice of the proposed settlement in English, Spanish, Chinese,  
10 and Punjabi to be posted via email to the list-servs for the Northern California chapter of AILA  
11 (American Immigration Lawyers Association) and the Northern California chapter of the  
12 National Lawyers' Guild. I directly posted the notice in all four languages (English, Spanish,  
13 Chinese, and Punjabi) to the list-serv for the Immigration Committee of the local chapter of the  
14 National Lawyers' Guild, and the organization's executive director informed me that, per my  
15 request, he forwarded the posted notices to the local chapter's general membership list-serv as  
16 well. In the case of AILA, in accordance with arrangements I had previously made, I sent an  
17 email to the local chapter's leadership that included the text of the notice in English with links to  
18 translations of the notice in Spanish, Chinese, and Punjabi available on the websites of the  
19 American Civil Liberties Union Foundation of Northern California and Lawyers' Committee.  
20 The Secretary then forwarded my email to the list-serv for the Northern California chapter of  
21 AILA. I was copied on the posting and also received a separate email confirming the posting of  
22 the notice to the organization's list-serv.

23 3. Pursuant to the Court's January 23, 2014 Preliminary Approval Order, on  
24 January 30, 2014, I secured the posting of notice of the proposed settlement in English, Spanish,  
25 Chinese, and Punjabi on the website of the Lawyers' Committee by providing the notice in all  
26 four languages to our organization's Communications Director who is able to add material to the  
27 Lawyers' Committee website. The Communications Director sent me an email confirming  
28 posting of the notices on the Lawyers' Committee website, and I also independently confirmed

1 that the notices appeared on the website. The notice in all four languages remained posted for  
2 more than thirty (30) days.

3 4. Plaintiffs' counsel at the Lawyers' Committee have not received any objections in  
4 writing, via regular or electronic mail, or by telephone or voicemail to final approval of the  
5 parties' settlement agreement. Nor have we received any requests for copies of the notice in any  
6 alternate format.

7 I declare under penalty of perjury that the foregoing is true and correct to the best of my  
8 knowledge. This declaration was executed on this 6th day of March, 2014, in San Francisco,  
9 California.

10  
11 /s/ Robin Goldfaden  
Robin Goldfaden

12  
13 **SIGNATURE ATTESTATION**

14 I, Catherine E. Moreno, attest that I obtained the concurrence of Robin Goldfaden in  
15 filing this document. I declare under penalty of the laws of the United States that the foregoing  
16 is true and correct.

17 Executed this 6th day of March, 2014 in Palo Alto, California.

18 /s/ Catherine E. Moreno  
19 Catherine E. Moreno